

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:**FREE SPEECH SYSTEMS, LLC,****DEBTOR.**

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Case No. 22--60043**Chapter 11 (Subchapter V)**

WITNESS AND EXHIBIT LIST

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Monday, August 29, 2022
Hearing Time:	1:00 p.m. (Central Standard Time)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	Ray Battaglia; Kyung S. Lee; RJ Shannon
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	<p>Hearing on:</p> <ul style="list-style-type: none"> Emergency Motion for Relief from the Automatic Stay [ECF No. 15] (the "<u>Connecticut Lift Stay Motion</u>"); Emergency Application of Debtor for an Order (A) Authorizing Employment of Pattis & Smith LLC Under 11 U.S.C. § 327(e) and 328(a) as Special Counsel Nunc Pro Tunc to August 1, 2022, and (B) Granting Related Relief [ECF No. 93] (the "<u>Pattis Employment Application</u>"); and Emergency Application of Debtor for an Order (A) Authorizing Employment of The Reynal Law Firm, P.C., under 11 U.S.C. § 327(e), as Special Counsel, Nunc Pro Tunc to July 29, 2022, and (B) Granting Related Relief [ECF No. 94] (the "<u>Reynal Employment Application</u>").

Free Speech Systems, LLC, the debtor and debtor in possession in the above captioned case (the "Debtor"), hereby submits this witness and exhibit list in connection with the hearing to be held on Monday, August 29, 2022, at 1:00 p.m. (Central Standard Time) (the "Hearing") on the Connecticut Lift Stay Motion, the Pattis Employment Application, and the Reynal Employment Application.

WITNESSES

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. W. Marc Schwartz, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Any witnesses necessary to establish notice of the Hearing has been provided; and
3. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

EXHIBITS

The Debtor may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Transcript of August 2, 2022, Hearing in Connecticut Superior Court				
2	Pattis Engagement Letter for Post-Petition Services				
3	Pattis Declaration in Support of Application to Employ				
4	Pattis Amended Declaration in Support of Application to Employ				
5	Reynal Engagement Letter for Post-Petition Services				
6	Reynal Original Engagement Letter				
7	Reynal Declaration in Support of Application to Employ				
8	Reynal Amended Declaration in Support of Application to Employ				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Dated: August 26, 2022

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/s/ R. J. Shannon

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